



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

535 HERNDON PARKWAY □ P.O. BOX 1169 □ HERNDON, VIRGINIA 20172-1169 □ 703-689-2270
888-FLY ALPA (888-359-2572) □ FAX 703-689-4370

February 21, 2006

Federal Aviation Administration
Transport Airplane Directorate
ANM-116
ATTN: Rules Docket No. 2005-NM-242-AD
1601 Lind Avenue, S. W.
Renton, Washington 98055-4056

IN QUALIFIED SUPPORT

Ladies and Gentlemen:

The Air Line Pilots Association (ALPA), representing the safety interests of 62,000 professional airline pilots flying for 39 airlines, has reviewed the proposed Airworthiness Directive (AD) which affects certain Airbus transport category airplanes.

This AD would require inspections to determine if a certain actuator is installed in the pilot's or co-pilot's seat, and doing applicable corrective actions if necessary. For certain actuators, the proposed AD also would require replacing rotors on both vertical and horizontal movements with new rotors, and replacing the clutch cap with a new cap. This proposed AD results from a report of heavy wear at the driving gear of the rotor shaft end of the electrical driven motor on certain actuators of the pilot's and co-pilot's seats.

ALPA recommends that the compliance time for actuator/component replacement should be no greater than 50% of the component time-in-service that would result in the noted unsafe wear condition. If the AD-specified compliance time meets this criterion, then the AD as written is satisfactory; if not, the AD compliance time should be reduced accordingly.

The actions specified by this proposed AD are intended to prevent uncommanded movement of the pilot's or co-pilot's seat during takeoff or landing, which could result in interference with the operation of the airplane and consequent temporary loss of airplane control. We agree that an unsafe condition has been identified, and should be corrected as discussed above.

Thank you for the opportunity to comment.

Sincerely,

Michael Huhn
Staff Engineer
Engineering & Accident Investigation

MH:ak